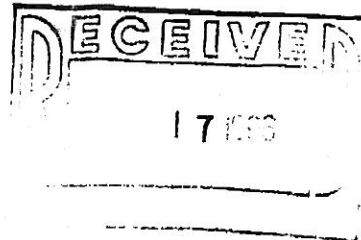


2E80C



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment



MEMORANDUM

MAL-DD-009

DATE: January 14, 1997

TO: Distribution

FROM: C. L. Guthrie Project Management, T130F, X2535

SUBJECT: INTERNAL REVIEW OF THE HEALTH & SAFETY PLAN FOR BUILDING 779
CLUSTER— CLG-001-97



000065479

Action: Return Comments by January 22, 1997

PURPOSE

The purpose of this memorandum is to distribute the above mentioned Health & Safety Plan for your review and comment.

DISCUSSION

Comments are due to Mark Zachary by Close of Business, January 22, 1997. Please submit comments on the attached Review and Comment Sheet via the site mail system or fax to 8244 in T130F.

RESPONSE REQUIREMENTS

Please fill out a comment sheet even if you don't have any comments by marking the "No Comments" box and entering your name and signature on the form. If you have any questions or concerns, please call Mark Zachary at X5686.

MZ:dlu

Attachments: (2)
As Stated

Distribution

J. Chapin - T130F
M. Findley - T130F
G. Guinn - T130F
C. Guthrie - T130F
M. Hickman - T130F
J. Hernandez - T130F
R. McCafferty - T891C
M. Nelson - T891C

T. Sangaline - T891C
R. Sexton - T130F
M. Zachary - T130F
Corres Control - B116



DOES NOT CONTAIN
UNCLASSIFIED CONTROLLED
NUCLEAR INFORMATION

Reviewing Official: J. A. NESHEIM, DC & UCNI RO
EMCBC Class Name Office

Date: 07-08-08

Confirmed unclass. & not CUCO.
OK for public release

ADMINISTRATIVE

B779-A-00034

PARALLEL REVIEW COMMENT SHEET

Please review the attached : Health and Safety Plan

Building 779 Cluster
Decommissioning Project

Comments not received by COB 22 JAN 97 will be considered for the next revision.

Only Technical comments will be resolved.

Comments on Training issues will be reviewe and considered.

PAGE	SECTION OR STEP	TECHNICAL INACCURACIES/SUGGESTED CORRECTION	RMRS T&Q RESOLUTION	Resolution accepted INT/DATE

Name
Ext./Pager/Fax

Signature
Bldg./Dept./Director

Return to Course Coordinator:
8244 Mark Zachary 5686 T130F
FAX Name Ext. Location
If question on technical content, please call :
M.E. Hickman 7145
Name Ext.



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Building 779 Cluster Decommissioning Project Health and Safety Plan

Rocky Mountain Remediation Services, L. L. C.

REVISION 0

January 1997

**BUILDING 779 CLUSTER DECOMMISSIONING PROJECT
HEALTH AND SAFETY PLAN**

REVISION 0

JANUARY 1997

This Health and Safety Plan has been reviewed and approved by:

Mark Hickman, Project Manager

Date

Tonya Sangaline, Industrial Hygiene & Safety

Date

Ruth McCafferty, Industrial Hygiene & Safety, Lead

Date

This Health and Safety Plan was principally prepared by:

Mark Zachary, Industrial Hygiene & Safety

Date

BUILDING 779 CLUSTER DECOMMISSIONING PROJECT

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- 2 HS&P/AHA Briefing Sheet

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ACRONYMS

ACM	Asbestos Containing Material
ALARA	As Low As Reasonably Achievable
ARARs	Applicable or Relevant and Appropriate Requirements
AHA	Activity Hazard Analysis or Job Safety Analysis (JSA)
AIHA	American Industrial Hygiene Association
CFR	Code of Federal Regulations
COC	Chain of Custody
D&D	Decontamination and Decommissioning
DOE	U. S. Department of Energy
DOE/RFFO	DOE/Rocky Flats Field Office
DOT	Department of Transportation
DQO	Data Quality Objective
EPA	U. S. Environmental Protection Agency
H&S	Health and Safety
HASP	Health and Safety Plan
HAZCAT	Hazardous Category
HEPA	High Efficiency Particulate Air
HVAC	Heating, Ventilating, Air Conditioning
HWP	Hazardous Work Permits
IDL	Instrument Detection Limit
IWCP	Integrated Work Control Program
LEL	Lower Explosive Limit
LLW	Low Level Waste
MAA	Material Access Area
MDA	Minimum Detectable Activity
MSDS	Material Safety Data Sheet
NIOSH	National Institute of Occupational Safety and Health
OSHA	Occupational Safety and Health Act
PCB	Polychlorinated Biphenyl
PEL	Permissible Exposure Limit
PPE	Personal Protective Equipment
QA	Quality Assurance
QAPjP	Quality Assurance Project Plan
QC	Quality Control
RAD	Radioactive
RCRA	Resource Conservation and Recovery Act
RCT	Radiological Control Technician
RPOSO	Radiation Protection and Occupational Safety Officer
RFCA	Rocky Flats Cleanup Agreement
RFETS	Rocky Flats Environmental Technology Site
RMRS	Rocky Mountain Remediation Services, L. L. C.
RWP	Radiological Work Permit
SNM	Special Nuclear Materials

TCLP	Toxicity Characteristic Leaching Procedure
TIC	Tentatively Identified (organic) Compounds
TRU	Transuranic
VOC	Volatile Organic Compound
WBS	Work Breakdown Structure
WM	Waste Management
WSP	Work Summary Plan

BUILDING 779 CLUSTER DECOMMISSIONING PROJECT HEALTH AND SAFETY PLAN

1.0 GENERAL INFORMATION

1.1 SCOPE AND APPLICABILITY

The purpose of this Health and Safety Plan (HASP) is to identify, mitigate, and eliminate potential safety and health hazards associated with the decommissioning of Building 779 Cluster Decommissioning Project. Procedures and controls will be identified in this HASP that will help prevent and reduce the risk of personnel injury and/or illness and property and/or environmental damage/impacts. This HASP is applicable to all decommissioning work related activities performed on Building 779 and its supporting facilities. Major activities include, but are not limited to:

- Sampling, characterization, and removal of chemical, hazardous, and radiological materials and waste
- Glovebox and associated equipment and utilities removal
- Major decontamination activities
- Building and structure dismantlement

Rocky Mountain Remediation Services, L. L. C. (RMRS) and its subcontractors will utilize the RMRS Safety Plan and subcontractor safety plans in conjunction with the Site Health and Safety Manual as the upper tier documents to govern health and safety of the workers during the decommissioning process. Occupational Safety and Health Act (OSHA) Standards 29 CFR 1910 and 1926 will be utilized in conjunction with other approved company and sub tier specific documents to ensure worker protection and safety. From a radiological standpoint, the Department of Energy Radiological Controls Manual (RCM), 10 CFR 835 and the Rocky Flats Environmental Technology Site (RFETS) specific RCM (Site RCM) will be utilized for worker radiological safety.

No task (excluding walkdowns or general work tasks) will be performed in support of this project until an Activity Hazard Analysis (AHA) (Reference Appendix 1) has been written and approved that addresses the task or activity. The AHA will identify the principal steps involved and the sequence of work activities, the potential safety and health hazards associated with each step, the specific controls associated with each potential hazard, the task specific special equipment to be used in performing the activity, and monitoring.

1.2 PROJECT DESCRIPTION

The scope of the project consists of the removal of numerous components, associated equipment, and building structure materials in 12 buildings which contain the following type of materials:

- Lead lined gloveboxes
- Non lead lined gloveboxes
- All associated utilities
- Piping, valves, panels, and other structural components
- Ventilation ducting and hoods
- Miscellaneous containers, furnaces, tool boxes, and drums

- Any other items or components to allow total decommissioning of the rooms. This can include: characterization activities, decontamination of equipment and building structures, draining and decontamination of piping, removal of concrete structures, ceiling tiles, framing, filters, room bracing, etc.

This project will result in the generation of hazardous, mixed, low-level waste, industrial, and transuranic wastes as described in the project's Waste Management Plan. The project will require that a pre-job assessment be conducted to identify hazardous, chemical, industrial, and radiological contaminants that may be present within the modules/rooms during the equipment removal process.

Further description may contain Unclassified Controlled Nuclear Information (UCNI).

Reference the Building 779 Waste Stream and Residue Identification and Characterization Report (WSRIC) for additional information.

2.0 ORGANIZATION/HEALTH AND SAFETY RESPONSIBILITIES

2.1 PROJECT MANAGER

The project manager is responsible for overall management and compliance with federal, state, and local health and safety requirements and RMRS and its subcontractor's policies, plans and procedures for this project.

The project manager must ensure adequate and available resources are maintained to ensure compliance and safety of every worker (reference Figure 2-1 for a detailed review of the project organizational chart).

2.2 DECOMMISSIONING CONSTRUCTION SUPERINTENDENT

The Decommissioning Construction Superintendent is responsible for implementation and compliance with all applicable health and safety requirements including this HASP. The Construction Superintendent or designee is responsible for reviewing and approving all AHAs.

2.3 ENVIRONMENTAL SAFETY HEALTH AND QUALITY (ESH&Q) DIRECTOR

The ESH&Q Director is responsible to assign a project Health and Safety representative/designee.

The Industrial Hygiene & Safety (IH&S) Lead or designee is responsible for verifying compliance with all applicable safety and health requirements, and coordinating all required health and safety monitoring and sampling. The Health and Safety representative shall review and approve all AHAs.

The IH&S lead or designee is responsible for the development of the HASP, assisting with development of AHAs and providing technical guidance with respect to all applicable health and safety requirements.

2.4 RADIOLOGICAL CONTROL ORGANIZATION

Radiological Control Manager - is responsible for the overall implementation of the Site radiological control program.

Radiation Protection and Occupational Safety Officer (RPOSO) - is responsible for overall radiological safety while decommissioning activities are being performed during the Building 779 Cluster Decommissioning Project.

Health and Safety Plan Building 779 Cluster Decommissioning Project

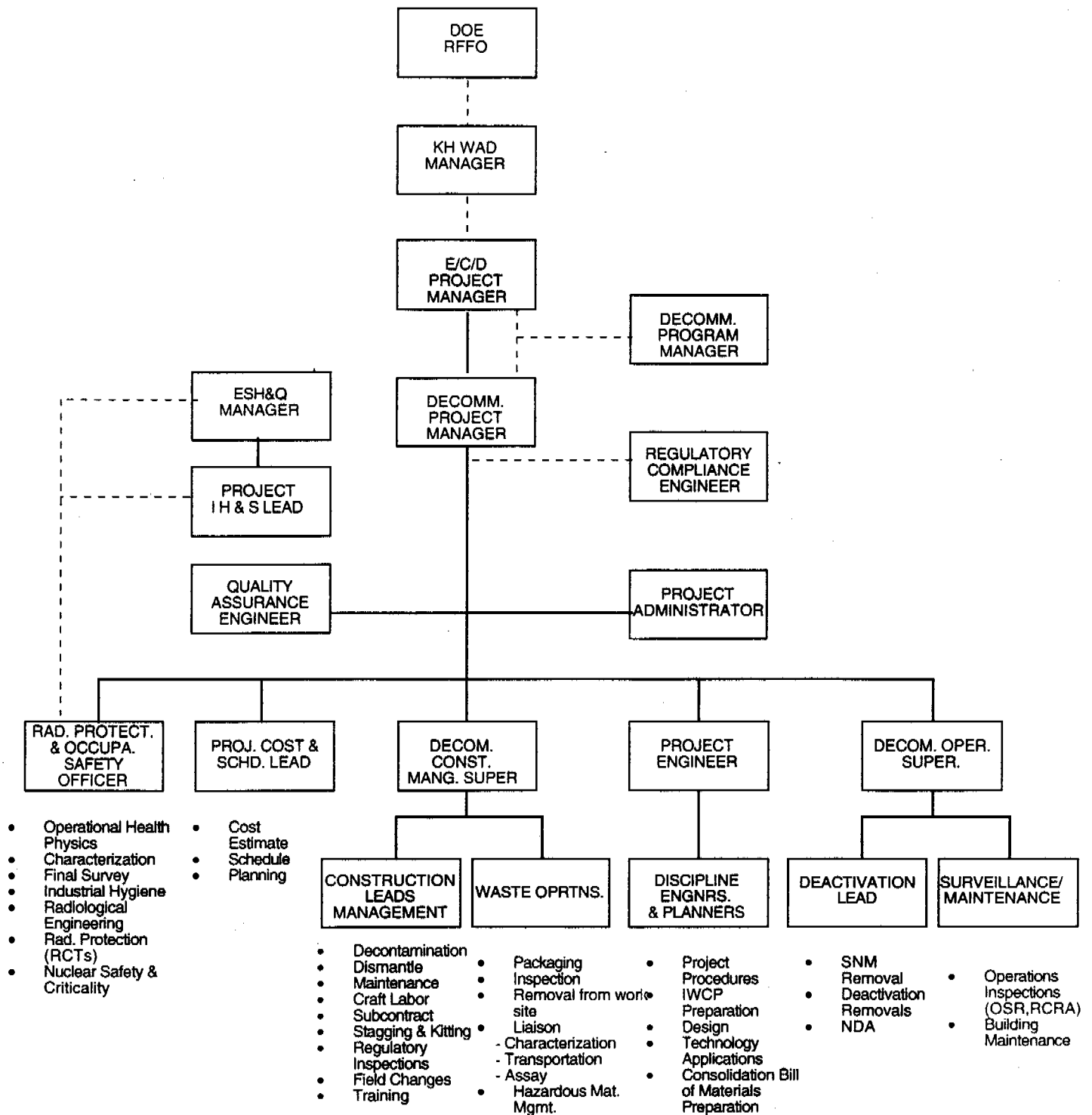


Figure 2.1
Decommissioning Project Organization

Radiological Operations Foreman - provides supervision of Radiological Control Technicians (RCTs) and ensure compliance with the Radiological Work Permit (RWP) and applicable procedures.

Implements and ensures completion of Radiological Surveys, as required to support the project's schedule.

RCTs - provide radiological monitoring for personnel exposure hazards. Performs pre-job and other radiological surveys. Ensures compliance to the RWP and ensures appropriate actions are taken in response to radiological emergencies or contamination events.

Radiological Engineering - defines the engineering, administrative, and work activity controls for identified radiological hazards. Defines personal protective equipment (PPE) requirements for radiological hazards. Defines requirements for the release of property or materials according to HSP 18.10 and ROI 3.02.

2.5 CRAFT FOREMAN/ FIELD ENGINEER

Supervise the activities of craft personnel.

Conduct pre-evaluation job briefings, assist in AHA development, approvals and briefings, and perform/assist in Site Specific HASP training as necessary.

2.6 SITE WORKERS

Comply with the task-specific HASP, AHAs, and applicable RFETS practices, procedures, and policies. Report any accidents, injuries, or near misses immediately to the Craft Foreman/Field Engineer. Assist with development of AHAs. Assure all training required is current.

2.7 VISITORS

Visitors entering the work area during field activities will receive a briefing on the requirements of this HASP. In addition, visitors must have received General Employee Radiological Training, wear dosimetry and other PPE, as required by the RWP, HASP, and AHAs. Normally, visitors will not perform hands on work activities. Training for visitors shall be commensurate with the areas being visited and meet the requirements of the Site RCM, Article 622 or 657.

Visitors who enter any area of the activities where they may be exposed to hazards of the project must be trained on the requirements of this Project HASP. Visitors who enter the work area or sign in under the RWP, who do not meet the minimum training requirements shall not be permitted to perform hands on work and must be escorted by a site worker who meets minimum training requirements.

Visitors will be kept to a minimum and will confer with the Craft Foreman and RCT Supervisor/Foreman prior to entering work area.

3.0 HEALTH AND SAFETY HAZARD ASSESSMENT

3.1 POTENTIAL HEALTH AND SAFETY HAZARDS

Potential health and safety hazards will be identified for each task and an AHA. Potential health hazards could include: lead, asbestos, radioactive materials, beryllium, acids or other hazardous materials, and/or chemicals. Other potential hazards may include: hoisting and rigging, scaffolding usage, lockout/ tagout concerns, fall protection issues and confined space entries. Due to the potential hazardous materials and chemical exposure to the workers, characterization of asbestos, lead, beryllium, acids, Polychlorinated Biphenyls (PCBs), uranium, plutonium, and radioactive contaminants will be accomplished in accordance with approved Building 779 Reconnaissance Level Characterization survey plans and Site procedures. Examples of some of the hazards in the facility are:

1. Possible Asbestos Containing Material in floor, walls and ceiling tiles
2. Chemicals, acids, and solvents in various laboratories
3. PCBs in battery rooms

Additionally, characterization for presently unidentified hazards will be performed as they are identified.

3.2 PROTECTIVE CONTROL MEASURES

Control methods will be specified for all identified hazards for each principal step listed in the AHA. These control methods could include engineering controls, administrative controls, and PPE.

4.0 MONITORING

The need for chemical hazard monitoring will be determined by the project IH&S Lead or designee. All air sampling and monitoring will be performed in accordance with approved National Institute of Occupational Safety and Health (NIOSH) or Occupational Safety and Health Act (OSHA) sampling methods using either direct reading instrumentation or personal air sampling as directed by the IH&S Lead or designee. All instrumentation used will be calibrated in accordance with factory recommendations.

Monitoring for radiological hazards, as necessary, will be identified in RWP's. All radiological monitoring will be performed in accordance with the procedures contained in the Site Health and Safety Practices Manual and the Site RCM.

5.0 HEALTH AND SAFETY TRAINING

5.1 PROJECT-SPECIFIC/GENERAL EMPLOYEE TRAINING

All project field personnel shall receive project-specific training and general employee training regarding the following topics:

- Key project personnel and chain of authority;
- Safety, health, and other known hazards present on the project;
- Use of PPE;
- Work practices;
- Engineering controls;
- Medical surveillance requirements, including recognition of symptoms and signs which might indicate over exposure to hazardous/chemical materials and heat stress
- Emergency Procedures;
- Rad Worker I (Core Requirements) and Radworker II
- Hazard Communication
- General Employee Training
- Hearing Conservation
- Beryllium and Asbestos Awareness

- Respirator Indoctrination
- Nuclear Materials Handlers and Transporters
- 40 hour Hazwoper Training
- 8 hour annual Hazwoper refresher as necessary
- 8 hour Hazwoper Supervisor Training as appropriate

Additionally, depending on the job task, personnel may be trained in the following areas:

- | | |
|--------------------------------|------------------------------------|
| • Asbestos Awareness | • Electrical Safety |
| • Confined Space Entry | • Glovebag Usage |
| • Lead Awareness | • Ladder Safety |
| • PCB Awareness | • Forklift Usage |
| • Aerial Lift | • Hoisting Apparatus |
| • Fall Protection | • Proper Tool and Machine Guarding |
| • Scaffolding Usage | • Welding/Cutting Operations |
| • Lockout/Tagout | • Demolition |
| • Basic Respiratory Protection | • Ergonomics |

Individuals will be trained in their specific job task(s). The Site-specific training shall be performed as part of pre-job briefings, AHA briefings, "tool-box" safety training, or regular safety meetings. Retraining shall be conducted whenever this HASP is revised and where it impacts field conditions, new AHAs are developed or when AHAs are revised due to work conditions changing. General Health and Safety Training (i.e., asbestos, lead, beryllium, and radiological) will be listed in the AHA and/or RWP and will be conducted in accordance with general employee training procedures. Site-specific HASP Training will be documented on Appendix 2 by the Craft Foreman, Construction Engineer, or IH&S Lead or designees.

5.2 RESPIRATOR TRAINING

Employees required to wear respiratory protection must be trained and fit-tested in the specific respirators worn. Annual Respiratory Indoctrination (computer-based training), medical evaluation, and fit-test are required for all respirator use. If supplied air is to be used, training on that specific equipment, a medical evaluation, and fit-testing are required. Respirator qualification and usage for asbestos, radiological, or lead will follow the specific requirements for that hazard in regards to fit test frequency, medical qualifications, etc.

5.3 LEAD WORKER TRAINING

Employees potentially exposed to lead must have Lead Worker Awareness Training.

5.4 ASBESTOS TRAINING

Employees working in areas where asbestos is present are required to have Asbestos Awareness Training.

Employees likely to disturb asbestos containing materials in the course of work, are required to have Asbestos Worker Training per the Site procedure (HSP - 13.07) and completed training in accordance with OSHA 1926.1101.

5.5 BERYLLIUM TRAINING

Employees potentially exposed to beryllium are required to receive Beryllium Worker Training (computer-based training) and ensure the requirements of HSP 13.04 are implemented.

6.0 PERSONAL PROTECTION EQUIPMENT (PPE) PROGRAM

PPE for the project will be selected by an IH&S personnel for the specific hazards to be encountered. Workers will be trained in the use, maintenance, and disposal of the PPE assigned to them in accordance with 29 CFR 1910.132 and the RFETS respiratory protection program.

At a minimum, workers entering Building 779 Cluster will be required to wear:

- Safety shoes
- Eye Protection with side shields
- Hard hat in posted hard hat areas

To enter Radiological Controlled Areas or buffer areas in the 779 Cluster, workers will normally be required to wear the following:

- Safety shoes
- Eye protection with side shields
- RFETS company provided long sleeve coveralls
- RFETS company provided Tyvek or cotton coveralls
- Gloves and shoe covers
- Respiratory protection as described by the AHA or RWP

Note: This is only an example, as PPE requirements are subject to change based on the most current and continually changing conditions during the Decontamination and Decommissioning (D&D) process.

As job conditions dictate, the IH&S group will evaluate the specific PPE for that particular task(s). This may involve the use of class A (the most restrictive), class B, class C, or class D (the least restrictive) PPE.

When prescribing PPE, the IH&S group will consider the following factors:

- Permeability, degradability, penetrability by specific agents expected for the job task(s)
- Heat/cold (thermal effects)
- Durability
- Flexibility
- Ease of decontamination
- Compatibility with other equipment
- Special conditions (fire, explosive, electrical, chemical, radiological, O₂ deficient atmospheres, etc.)

7.0 MEDICAL SURVEILLANCE

Project personnel who are or may be exposed to hazardous substances or health hazards will receive hazardous waste worker medical surveillance as specified in 1910.120 (f) and 1926.65 (f).

In addition, and in accordance with 29 CFR 1926.62, personnel potentially exposed to lead will receive a baseline blood test for lead and zinc protoporphyrin.

Personnel potentially exposed to beryllium will be included in the beryllium medical surveillance program.

Asbestos workers will conform to medical monitoring requirements as defined in 10 CFR 1926.1101 and the Site-specific Health and Safety Manual, (HSP-9.09).

8.0 SITE CONTROL MEASURES

8.1 SITE COMMUNICATIONS

Project personnel will have access to telephones located in the immediate area. Emergency information will be communicated to Building 779 Clusters by way of the Life Safety/Disaster Warning System (LS/DW) (reference Figure 8-2 to view a map of the 779 Cluster layout).

8.2 WORK ZONES

The project site will be posted as an RMRS work area and access to the area will be limited to those personnel working on the project. Additional work zones such as regulated areas for lead, asbestos, beryllium, and radiological hazards will be established in accordance with the applicable requirements and will be indicated in the AHAs. Building 779 Operations and Maintenance personnel will require access due to ongoing activities; however, they will be required to comply with this HASP and the associated AHAs. Operations and Maintenance personnel shall be briefed per Section 5.2 of this HASP and sign in on the briefing form (reference Appendix 2).

8.3 HOUSEKEEPING

During the decommissioning process of Building 779 and its clusters, housekeeping will be of utmost importance throughout the project. HSP 13.08 and OSHA Standard 1926.25 will be utilized as the minimum standards for housekeeping.

8.4 SITE SECURITY

Building 779 Clusters are in a controlled access area. Entry into Building 779 Clusters are limited to personnel requiring access; for routine operations, maintenance, and performing activities addressed by this plan.

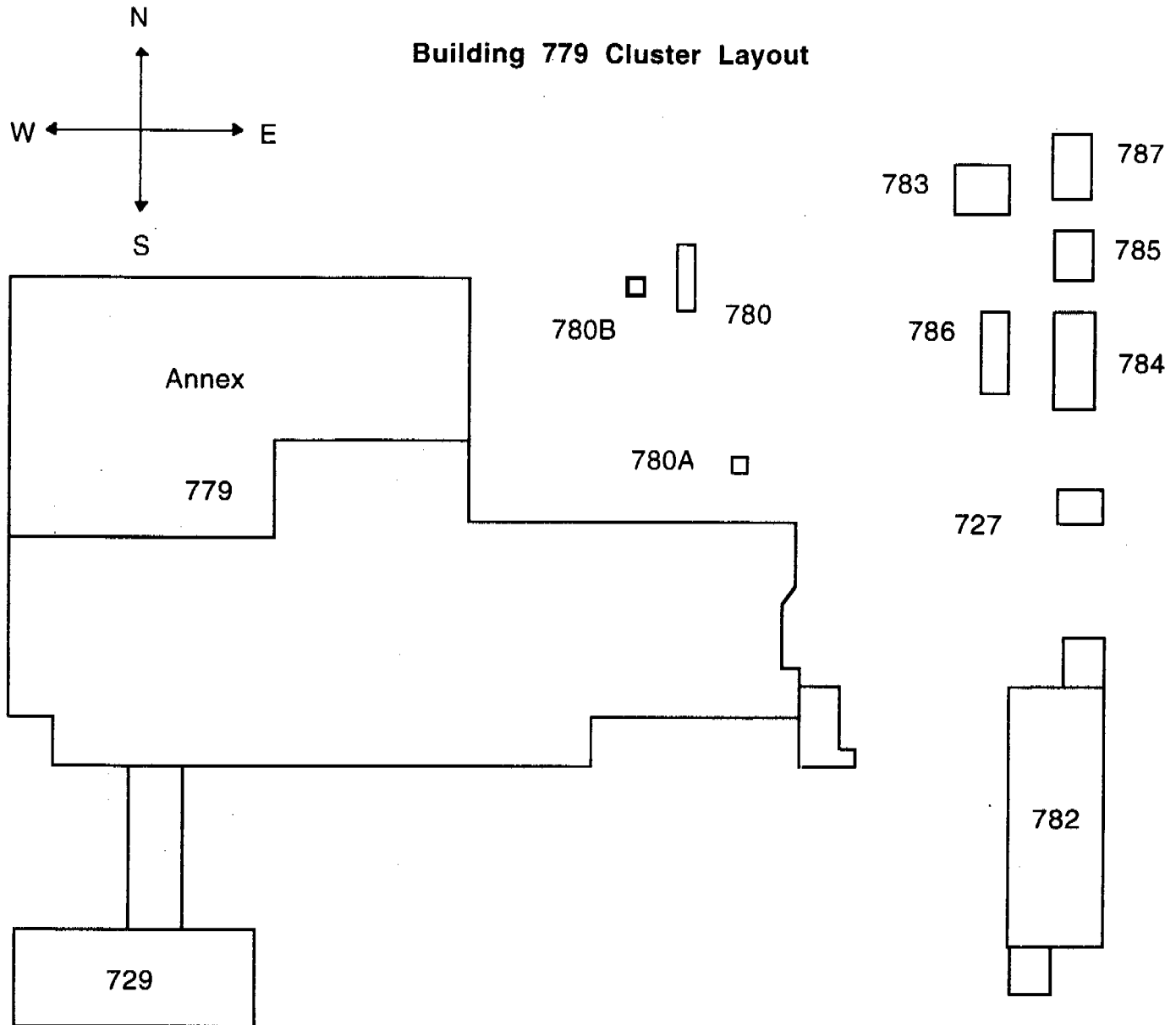
Personnel requiring access must have completed the required training, medical surveillance, and wearing the prescribed PPE, as well as signed-in on the RWP and AHA, as applicable.

8.5 SANITATION

Sanitation facilities, potable water, and change locations will be available and located in close proximity of work areas, and ensure compliance with 29 CFR 1926.51.

9.0 DECONTAMINATION PROCEDURES

Specific decontamination procedures, as applicable and depending on the hazard, will be addressed in the RFETS Site RCM, Part 4, Section 541.



- | | |
|------|--|
| 727 | Emergency diesel generator facility serving Building 779. |
| 729 | Facility containing filter plenums and emergency diesel generator. |
| 779 | Research and Development Center. |
| 780 | Paint/Storage Facility. |
| 780A | Metal Storage Facility. |
| 780B | Gas Bottle Storage Facility. |
| 782 | Filter Plenum Exhaust Enclosure For Building 779 Exhaust. |
| 783 | Building 779 Cooling Tower Pump House. |
| 784 | Building 779 Cooling Tower Support Facility (A, B, C, D). |
| 785 | Building 779 Cooling Tower Support Facility. |
| 786 | Building 779 Cooling Tower West Chiller. |
| 787 | Building 779 Cooling Tower East Chiller (A, B, C, D). |

Figure 8-2

**Revision 0
Jan 1997**

9.1 RADIOLOGICAL

Decontamination for potential radiological contamination will be performed in accordance with the applicable procedures in the Health and Safety Practices Manual and Radiological Operating Instructions Manual and as specified in the RWP.

9.2 LEAD

Decontamination of lead will be performed in accordance with 29 CFR 1926.62 (g), (h), (i), and project specific Lead Compliance Plans. All AHAs for lead work will have the approval of an RMRS IH&S Industrial Hygienist.

9.3 ASBESTOS

Removal of asbestos containing materials will be performed in accordance with 29 CFR 1926.1101, EPA 40 CFR 763 and the Health and Safety Practices Manual. All AHAs and asbestos work plans will be approved by an RMRS IH&S Hygienist.

9.4 BERYLLIUM

Decontamination for beryllium will be performed in accordance with the Site Health and Safety Practices Manual, (HSP 13.04). All AHAs and work plans for beryllium work tasks will be approved by an RMRS IH&S Industrial Hygienist.

10.0 EMERGENCY RESPONSE

10.1 PRE-EMERGENCY PLANNING

All field project personnel will be informed of the emergency response procedures contained in this plan and the Site-specific Building 779 Emergency Plan, (BEPLAN-14.779). Building 779 management will be aware of project activities by way of the 779 Plan-of-the-Day meeting. (Reference Figure 10-3 for a review of the Site layout and Building 779 Cluster.)

10.2 COMMUNICATION

In the event of an incident requiring emergency response, call extension 2911 by telephone. Also, report emergencies to the 779 Operations Manager at extension 7088 and the Project Manager at extension 7145. These personnel can also be reached via radio and pager communications.

10.3 SAFE DISTANCES AND PLACES OF REFUGE

In the event of an incident requiring emergency evacuation of the facility, all personnel will evacuate, follow LS/DW instructions and assemble at the designated 779 assembly areas. Normal radiological alarms and response procedures shall be followed in Building 779 and supporting facilities.

10.4 EVACUATION ROUTES

Evacuation routes are posted at various locations within the building(s) and project personnel will be informed of the routes during pre-evolution briefings.

10.5 EMERGENCY MEDICAL TREATMENT AND FIRST AID

Emergency medical assistance can be obtained by calling extension 2911 by phone. Site Emergency Response personnel will determine if off-site medical transportation and assistance is required. Individuals requiring non-emergency medical treatment or first aid will be transported to the Occupational Health Clinic, Building 122 for treatment. The Project Manager and 779 Operations Manager will be immediately notified of any such incidents.

SITE MAP

Bldg. 779 & Associated Structures

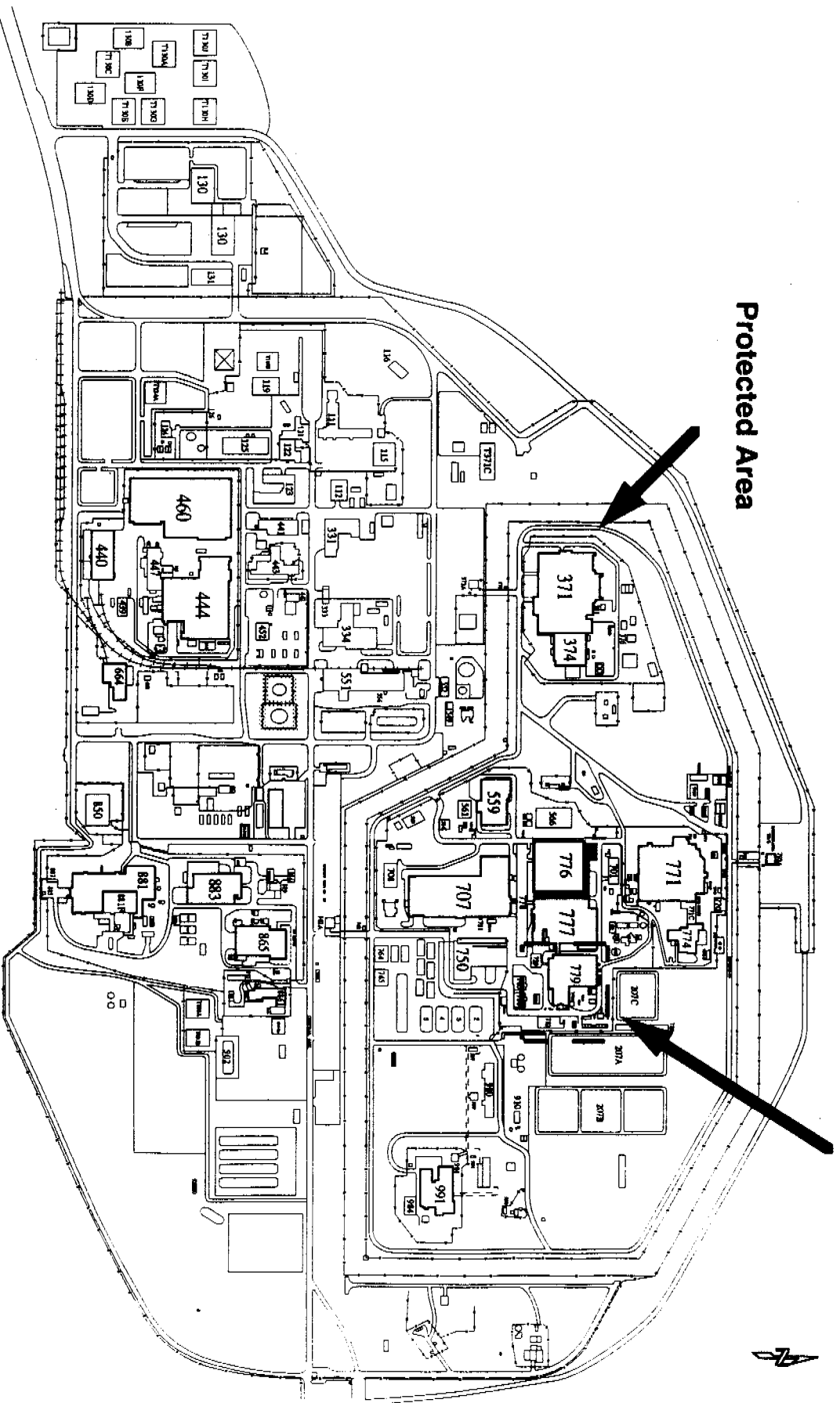


Figure 10-3 Building 779 Cluster Decommissioning Area

10.6 PPE AND EMERGENCY EQUIPMENT

The project will maintain available the PPE necessary to perform work as outlined in the AHA. In addition, fire extinguishers will be available at the project site. The RFETS Fire Department and HazMat Team maintains a supply of additional emergency equipment.

11.0 CONFINED SPACE ENTRY

All confined space entries will be performed in accordance with HSP 6.04, OSHA Standard 1926.21, OSHA Standard 1910.146, and the Confined Space Entry Program. All confined space entry AHAs, work plans, and permits will be approved by an RMRS IH&S Industrial Hygienist.

12.0 LOCKOUT/TAGOUT OPERATIONS

Lockout/tagout operations will be controlled utilizing HSP 2.08, OSHA Standard 1926.417, and OSHA Standard 1910.147.

13.0 SPILL RESPONSE

All spill response will be performed in accordance with HSP 21.04, Emergency Response and Spill Control. Project personnel will respond to accidental spills as defined in HSP 21.04. All other spills of radioactive material or hazardous materials will be reported to extension 2911, and the project area evacuated.

14.0 SPECIAL EMPHASIS PROGRAM

RMRS IH&S and the Project D&D staff will continually review work task and evolutions to ensure the most efficient and safe work techniques are utilized when performing D&D task(s). In conjunction with the HASP and AHAs, a safety field monitoring program will be utilized to ensure worker awareness and knowledge are maintained at a high level. Timely reviews of safety concerns and employee suggestions will be performed and other proactive approaches will be utilized in an effort to address and minimize health and safety concerns/issues.

15.0 NUCLEAR SAFETY ANALYSIS

A decision based approach for documentation of the safety analysis for decommissioning of Building 779 and its clusters will be used. This approach will be a graded approach and will focus on the condition of the facility after deactivation of the buildings. Based on this evaluation and grading, the nuclear safety analysis will incorporate requirements to ensure the maximum nuclear safety elements are in place for the current state of the building(s). As D&D activities progress, the nuclear safety analysis will be continually reviewed and downgraded as facility elements are removed (reference Table 1 to review the particular document associations and current requirements).

Appendix 1

ACTIVITY HAZARD ANALYSIS

Activity Hazard Analysis Number: _____

Building/Room: _____

Job Title/Project: _____

Activity/Job Description: _____

Step	Potential Hazard	Protective Control Measures

IH&S Training Required	Safety/Special Equipment/Tools Required	Other Requirements Or Hold Points

JOB SUPERVISOR CONCURRENCE: _____

IH&S CONCURRENCE: _____

IH&S CONCURRENCE: _____

Appendix 2

I have read and/or been briefed on the contents of this Health and Safety Plan/Job Safety Analysis and agree to abide by all requirements and stipulations incorporated.

[illegible]

Table 1
Nuclear Safety Review - 779 Cluster

Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
Category 2 facility	SAR or applicable other authorization basis and H&SP.	DOP and H&SP including Bldg. 779 D&D Auditable Safety Analysis concerns.	Pu Inventory less than 900 or 450 (if building or building subunit criticality is precluded) grams.
Category 3 facility	SAR or applicable other authorization basis and H&SP.	DOP and H&SP including Bldg. 779 D&D Auditable Safety Analysis concerns.	Building or Building subunit Pu Inventory less than 8.4 grams.
Radiological facility	RFETS Radiological Control Manual and H&SP	DOP and RFETS Radiological Control Manual and H&SP including Bldg. 779 Cluster Auditable Safety Analysis concerns.	Building or Building Subunit. contamination levels are determined to be below approved clean-up criteria as per RIFCA.
Industrial facility	H&SP	H&SP	N/A
7.3.1 Primary Confinement System	Primary confinement is comprised of Zone I enclosure (e.g., gloveboxes), Zone IA hoods, inert or glovebox dry air systems, atmospheres and ventilation systems. The physical form of the hazardous material being handled may be such (nondispersible) that a lesser degree of confinement is suitable. The primary confinement function must be maintained when radioactive material including surface contamination is present.	The primary confinements function, Zone II levels, must be maintained when radioactive material including surface contamination is present. Alternate confinement during plenum decontamination will be defined by Radiological Engineering.	Removal of all loose contamination. No additional activities required in area served by confinement system, removable contaminations are below approved clean-up criteria.
7.3.2 Secondary Confinement System	LCO: One stage of each installed Zone II exhaust system HEPA filter shall be verified to operate at 99.9% efficiency. A operable pressure sensing device shall monitor the pressure differential between Zone II areas and outdoor atmosphere, and shall alarm in the Utilities control room at -0.2 in. w.g. (low). The pressure differential of Zone II areas shall be maintained ≥ 0.1 in. w.g. negative with respect to outdoor atmosphere. The Zone II system normally operates with two exhaust fans and one recirculating fan. Under an emergency condition, one exhaust fan is required and at least one exhaust fan shall be on emergency power. An alarm shall be generated on a loss of flow through either of the two exhaust fans. An interlock shall shut down the supply fan when an exhaust fan shuts down.	One stage of each installed Zone II exhaust system HEPA filter shall be verified to operate at 99.9% efficiency. A operable pressure sensing device shall monitor the pressure differential between Zone II areas and outdoor atmosphere, and shall alarm at -0.2 in. w.g. (low). The pressure differential of Zone II areas shall be maintained ≥ 0.1 in. w.g. negative with respect to outdoor atmosphere.	
7.3.3 Emergency Power System	LCO: Upon failure of offsite power systems, all nonessential operations shall be shut down, and emergency power shall be connected to the switch gear in ≤ 20 seconds. There shall be a minimum 24 hour supply of fuel for the diesel generators.	Not applicable to deactivated systems per Bldg. 779 D&D Auditable Safety Analysis.	N/A

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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.3.4.2 Criticality Alarm System	<p>LCO: The criticality alarm system shall be operable. Criticality alarm system detector coverage shall be as determined by Criticality Safety and shall ensure coverage is provided by at least three criticality alarm detectors (for building areas requiring coverage).</p> <p>For exterior doors not covered with "DO NOT ENTER" beacons, administrative controls to prevent inadvertent building entry in the event of a criticality alarm shall be employed.</p>	<p>The criticality alarm system shall be operable. Criticality alarm system detector coverage shall be as determined by criticality Safety and shall ensure coverage is provided by at least three criticality alarm detectors (for building areas requiring coverage).</p> <p>For exterior doors not covered with "DO NOT ENTER" beacons, administrative controls to prevent inadvertent building entry in the vent of a criticality alarm shall be employed.</p>	<p>Criticality alarm System and associated controls can be shut down and removed when an analysis performed in accordance with Site's Criticality Safety Manual shows that a Criticality Alarm System is no longer needed.</p>
7.3.4.3 Fire Detection	<p>LCO: The building fire alarm system shall be operable at all times, except during maintenance or repair. Plenums shall have at least one heat detector. The minimum number of heat detectors for gloveboxes, vaults, and storage containers shall be determined by Fire Protection Engineering.</p> <p>A heat activated alarm shall evoke a response by the Site fire department.</p>	<p>The building fire alarm system shall be operable at all times, except during maintenance or repair. Plenums shall have at least one heat detector.</p>	<p>Fire alarm system must be maintained until removed from an area or the building via Fire Protection Engineering approved plans.</p>
7.3.4.4 Fire Suppression	<p>LCO: All fire suppression systems shall be operable at all times except for maintenance or repair. During maintenance or repair, special precautions shall be Instituted as specified by Fire Protection Engineering.</p>	<p>All fire suppression systems shall be operable at all times except for maintenance or repair.</p>	<p>Fire suppression system must be maintained until removed from an area or the building via Fire Protection Engineering approved plans.</p>
7.4 Surveillance Requirements	<p>Surveillance requirements apply to testing, calibration, monitoring, and/or inspection to ensure that necessary quality and operational status of systems and components are maintained. Surveillance ensures that parameters and set points are periodically verified to be within the LCO, as identified in the previous section. Surveillance shall be documented.</p>	<p>Surveillance requirements apply to testing, calibration, monitoring, and/or inspection to ensure that necessary quality and operational status of systems and components are maintained. Surveillance ensures that parameters and set points are periodically verified to be within the LCO, as identified in the previous section. Surveillance shall be documented.</p>	
7.4.1 Primary Confinement System	<p>Surveillance requirements for Zone I enclosure pressure differential, Zone IA airflow, inert atmosphere, and exhaust system parameters are provided in the following sections.</p>	<p>Surveillance requirements for primary confinement systems are provided in the following sections.</p>	

Table 1
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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.4.2 Secondary Confinement System	<p>Surveillance: HEPA filter efficiencies shall be verified as acceptable (99.7%) before installation and (99.5%) after installation. DOP test new filters and filters adjacent to new filters that share common hold-down brackets to verify that the overall stage efficiency meets the LCO stage efficiency requirement of 99.9%. Periodically (not to exceed 18 months), perform DOP tests of one stage of each installed Zone II HEPA filter to verify LCO efficiencies.</p> <p>Monthly, verify that the differential pressure across each installed HEPA filter stage is less than or equal to 4 in. w.g. under normal flow conditions.</p> <p>Exhaust and recalculation fans shall be rotated monthly.</p> <p>Verify the integrity of HEPA filter stages when plenum entry is required, by in-place visual inspection in accordance with approved contractor's procedures.</p> <p>HEPA filter visual inspections shall be performed on tested stages and on those stages adjacent to tested stages where contact with filter surfaces may occur as a result of testing conducted inside the plenum.</p> <p>Test of the sealing of gaskets for the housing door downstream of the last stage of HEPA filters shall be performed during, and in conformance with, tests performed for specification compliance. With the doors close and the fans operating, DOP aerosol shall be sprayed externally along a full linear periphery of each door to check the gasket seal. Any detection (current instrument detection limit) of DOP in the plenum exhaust shall be considered an unacceptable test result; the gaskets shall be repaired and test repeated.</p> <p>Installed Zone II HEPA filters shall be replaced in accordance with approved contractor's procedures and in accordance with the following requirements:</p> <ol style="list-style-type: none"> 1. Failure to pass required in-place leak test. 2. Differential pressure across any HEPA filter Stage exceeds 4 inches w.g. <p>Exhaust and recirculating fans shall be inspected by Utilities during shift hours.</p>	<p>Surveillance: HEPA filter efficiencies shall be verified as acceptable (99.95%) after installation. DOP test new filters and filters adjacent to new filters that share common hold-down brackets to verify that the overall stage efficiency meets the stage efficiency requirement 99.9%. Periodically (not to exceed 18 months), perform DOP tests of one stage of each installed Zone II HEPA filter to verify efficiencies.</p> <p>Monthly, verify that the differential pressure across each installed HEPA filter stage is less than or equal to 4 in. w.g. under normal flow conditions.</p> <p>Verify the integrity of HEPA filter stages when plenum entry is required, by in-place visual inspection in accordance with approved procedures.</p> <p>HEPA filter visual inspections shall be performed on tested stages and on those stages adjacent to tested stages where contact with filter surfaces may occur as a result of testing conducted inside the plenum.</p> <p>Test of the sealing of gaskets for the housing door downstream of the last stage of HEPA filters shall be performed during, and in conformance with, tests performed for specification compliance. With the doors closed and the fans operating, DOP aerosol shall be sprayed externally along a full linear periphery of each door to check the gasket seal. Any detection (current instrument detection limit) of DOP in the plenum exhaust shall be considered an unacceptable test result; the gaskets shall be repaired and test repeated.</p> <p>Installed Zone II HEPA filters shall be replaced in accordance with approved procedures and in accordance with the following requirements:</p> <ol style="list-style-type: none"> 1. Failure to pass required in-place leak test. 2. Differential pressure across any HEPA filter stage 4 inches w.g. 	<p>Surveillance can be discontinued when the building has no loose radiological contamination remaining in it and no inventories of radiological materials greater than the levels found in 40 CFR 302 Table 302.4 plus Appendix B, which is not containerized in approved DOT shipping containers.</p>

Table 1
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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
<p>7.4.2 Secondary Confinement System</p> <p>Continued....</p>	<p>The flow controllers or pressure -differential controllers shall be actuated on a monthly basis to assure their designed functioning.</p> <p>Daily, verify that the pressure differential of one II areas is monitored by an operable measuring device, and is ≥ 0.1 inch w.g. negative with respect to outdoor atmosphere.</p>	<p>Exhaust and recirculating fans shall be inspected during shift hours.</p> <p>The flow controllers or pressure - differential controllers shall be actuated on a monthly basis to assure their designed functioning.</p> <p>Daily, verify that the pressure differential of Zone II areas is monitored by an operable measuring device, and is ≥ 0.1 inches w.g. negative with respect to outdoor atmosphere.</p>	
<p>7.4.4 Safety Monitoring, Detection, and Suppression Systems</p>	<p>Surveillance requirements for the criticality alarm, fire detection, and fire suppression systems are provided in the following sections. The operating status of these safety systems must ensure early detection of, or response to, abnormal conditions.</p>	<p>Surveillance requirements for the criticality alarm, fire detection, and fire suppression systems are provided in the following sections. The operating status of these safety systems must ensure early detection of, or response to, abnormal conditions.</p>	
<p>7.4.4.1 Selective Alpha Air Monitors</p>	<p>Section deleted.</p>		
<p>7.4.4.2 Criticality Alarm System</p>	<p>Surveillance: Daily, perform a visual check of each indicator on the criticality alarm system main panel display to verify normal status.</p> <p>Monthly, test each detector to verify detector response to radiation and an alarm state for the detector is achieved. Acceptance criteria for building coverage is that no more than one detector may be in an out-of-tolerance condition.</p> <p>Monthly, two detectors shall be activated into the alarm state by a test source to test the coincidence circuitry, and verify that the criticality alarm system main panel circuitry latches into the alarm mode and activates the audible and visual alarm signals.</p> <p>Monthly, verify all criticality alarm system beacons illuminate and rotate or strobe.</p> <p>Monthly, verify that the voltage for each battery cell in the criticality alarm system main panel is $\geq 85\%$ of manufacture's specifications or as allowed by documented engineering analysis/calculation.</p> <p>Quarterly, the main display panel and associated electronics shall be tested to ensure that all circuits and relays are operable.</p>	<p>Surveillance: Daily, perform a visual check of each indicator on the criticality alarm system main panel display to verify normal status.</p> <p>Monthly, test each detector to verify detector response to radiation and an alarm state for the detector is achieved. Acceptance criteria for building coverage is that no more than one detector may be in an out-of-tolerance condition.</p> <p>Monthly, two detectors shall be activated into the alarm state by a test source to test the coincidence circuitry, and verify that the criticality alarm system main panel circuitry latches into the alarm mode and activates the audible and visual alarm signals</p> <p>Monthly, verify all criticality alarm system beacons illuminate and rotate or strobe.</p> <p>Monthly, verify that the voltage for each battery cell in the criticality alarm system main panel is $\geq 85\%$ of manufacture's specifications or as allowed by documented engineering analysis/calculation.</p>	<p>Criticality Alarm System and associated controls can be shutdown and removed when an analysis performed in accordance with Site's Criticality Safety Manual shows that a Criticality Alarm System is no longer needed. Surveillance's can be discontinued as part of this work package.</p>

Table 1
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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
<p>7.4.4.2 Criticality Alarm System</p> <p>Continued....</p>	<p>Quarterly, verify that the battery capacity in the criticality alarm system main panel meets or exceeds the design requirements of the connected system.</p>	<p>Quarterly, the main display panel and associated electronics shall be tested to ensure that all circuits and relays are operable.</p> <p>Quarterly, verify that the battery capacity in the criticality alarm system main panel meets or exceeds the design requirements of the connected system.</p>	
<p>7.4.4.3 Fire Detection</p>	<p>Surveillance: Once a month, a visual inspection of the fire detection systems shall be performed by the Fire Department. Quarterly, an operational test including local audible alarms, panel operation, and alarm test to the Plant Protection Dispatch Center and Fire Department shall be performed by the Fire Department. The vaults' heat detection systems shall be tested quarterly by the Fire Department by actuating one detector. The plenum heat detectors shall be tested quarterly by the Fire Department.</p> <p>Every five years, a complete operability/functional test of all detector devices shall be performed by the Fire Department using the NFPA code. Replacement detectors shall be available if one or more are found to be malfunctioning. Repair/replacement activities shall begin when the malfunction is determined.</p> <p>The fire alarm panel and batteries shall be inspected monthly by the Alarms Support group and shall have an annual load test (by running on batteries for minimum NFPA requirements, then alarming panel for a minimum of 5 minutes).</p>	<p>Surveillance: Once a month, a visual inspection of the fire detection systems shall be performed by the Fire Department. Quarterly, an operational test including local audible alarms, panel operation, and alarm test to the Plant Protection Dispatch Center and Fire Department shall be performed by the Fire Department.</p> <p>The plenum heat detectors shall be tested quarterly by the Fire Department.</p> <p>Every five years, a complete operability/functional test of all detector devices shall be performed by the Fire Department using the NFPA code. Replacement detectors shall be available if one or more are found to be malfunctioning. Repair/replacement activities shall begin when the malfunction is determined.</p> <p>The fire alarm panel and batteries shall be inspected monthly shall have an annual load test (by running on batteries for minimum NFPA requirements, then alarming panel for a minimum of 5 minutes).</p>	<p>Fire alarm system must be maintained until removed from an area or the building via Fire Protection Engineering approved plans.</p> <p>Surveillances may be discontinued as part of these work packages.</p>

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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.4.4.4 Fire Suppression	<p>Surveillance: Monthly, all sprinkler control valves shall be inspected by the Fire Department to verify there are no obstructions.</p> <p>Quarterly, the Fire Department shall demonstrate that all sprinkler systems are operable by performing a 2 inch drain test at the riser to demonstrate flow from the underground mains, and shall demonstrate the operability of interior waterflow alarms by opening the inspector's test connection. When use of the inspector's test can would create a safety or environmental hazard (e.g. when discharge could result in formation of ice on walking surfaces when discharge could be environmentally adverse), the bypass connection may be used for demonstration of operability for interior waterflow alarms on automatic sprinkler system risers as approved by Fire Protection Engineering.</p>	<p>Surveillance: Monthly, all sprinkler control valves shall be inspected by the Fire Department to verify there are no obstructions.</p> <p>Quarterly, the Fire Department shall demonstrate that all sprinkler systems are operable by performing a 2 inch drain test at the riser to demonstrate flow from the underground mains, and shall demonstrate the operability of interior waterflow alarms by opening the inspector's test connection.</p> <p>When use of the inspector's test can would create a safety or environmental hazard (e.g. when discharge could result in formation of ice on walking surfaces when discharge could be environmentally adverse), the bypass connection may be used for demonstration of operability for interior waterflow alarms on automatic sprinkler system risers as approved by Fire Protection Engineering.</p>	<p>Fire suppression system must be maintained until removed from an area or the building via Fire Protection Engineering approved Plans.</p> <p>Surveillance may be discontinued as part of these work packages.</p>
7.5 Design Features	<p>This section identifies design features for which alterations are not to be made prior to appropriate safety reviews. Each design feature is a statement about a designed or engineered condition or feature which is important to safety. These are safety features and typically are not monitored by sensing systems. If a protective action is provided by the feature (e.g. alarms), it is covered in Sections 7.3 and 7.4.</p> <p>For Building 779, these design features include fire barriers, criticality design features, and the building's structural or mechanical capability to maintain a comprehensive envelope of safe operations which will limit risks to the health and safety of the public and employees to an acceptable level and adequately protect the environment.</p> <p>Any natural phenomena event or operational accident occurrence that can overwhelm this comprehensive envelope requires shutdown of operations and permission from the DOE before restarting. This includes breach of the structure (e.g., from natural phenomena or an explosion), loss of the building HVAC and filtration system, or any catastrophic operational accident that degrades design features.</p>	<p>This section identifies design features for which alterations are not to be made prior to appropriate safety reviews. Each design feature is a statement about a designed or engineered condition or feature which is important to safety. These are safety features and typically are not monitored by sensing systems. If a protective action is provided by the feature (e.g. alarms), it is covered in Sections 7.3 and 7.4.</p> <p>For Building 779, these design features include fire barriers, criticality design features, and the building's structural or mechanical capability to maintain a comprehensive envelope of safe operations which will limit risks to the health and safety of the public and employees to an acceptable level and adequately protect the environment.</p> <p>Any natural phenomena event or operational accident occurrence that can overwhelm this comprehensive envelope requires shutdown of operations and permission from the DOE before restarting. This includes breach of the structure (e.g., from natural phenomena or an explosion), loss of the building HVAC and filtration system, or any catastrophic operational accident that degrades design features.</p>	

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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.5.1 Fire Barriers	<p>All penetrations in fire barriers have been designed to provide adequate fire stop and to prevent a fire from spreading through the penetration. Ventilation penetrations of fire barriers (i.e., supply dampers) are provided with automatic fusible-link fire dampers which can also be automatically closed. Personnel accesses are protected by UL listed fire-rated doors.</p> <p>All fire-barrier-penetration fire seals shall be intact. A fire-barrier-penetration seal inspection shall be made by the Fire Department after any repairs or maintenance work. Penetrations from maintenance/construction activities shall be sealed appropriately to maintain the designed rating of the penetrated fire barrier.</p>	<p>All penetrations in fire barriers have been designed to provide adequate fire stop and to prevent a fire from spreading through the penetration. Ventilation penetrations of fire barriers (i.e., supply dampers) are provided with automatic fusible-link fire dampers which can also be automatically closed. Personnel accesses are protected by UL listed fire-rated doors.</p> <p>All fire-barrier-penetration fire seals shall be intact. A fire-barrier-penetration seal inspection shall be made by the Fire Department after any repairs or maintenance work. Penetrations from maintenance/construction activities shall be sealed appropriately to maintain the designed rating of the penetrated fire barrier.</p>	Fire barriers and associated fire seals must be maintained until removed from an area or the building via Fire Protection Engineering approved plans.
7.6 Administrative Controls	This section includes a brief summary of the training, internal review, and change programs for Building 779. Organizational lines of authority are delineated and a summary of the procedures-generation, review, and approval process is likewise covered.	This section includes a brief summary of the training, internal review, and change programs for Building 779. Organizational lines of authority are delineated and a summary of the procedures-generation, review, and approval process is likewise covered.	These D&D administrative controls shall remain in effect until this D&D project is completed.
7.6.1 Training	<p>All employees receive a new-hire orientation and an initial building indoctrination, followed by annual/biannual building indoctrination's. On-the-job training is provided by supervisors as appropriate. Some job classifications have formal training and certification requirements. Emergency response indoctrination and training is also provided annually. Safety meetings are conducted monthly for operating personnel and quarterly for office personnel.</p> <p>All employees who work in a process area, along with their immediate supervisors, receive core training in nuclear criticality safety, industrial safety, and radiation safety. Employees who handle radioactive materials are trained in hazardous material safety, glovebox safety, and supplied air techniques (where appropriate). Those who work in areas that generate or handle nonradioactive hazardous waste also receive specialized training related to safety, health, and environmental aspects. Employees involved in packaging and shipping radioactive and nonradioactive hazardous materials must have further specialized training in hazardous materials handling, packaging, and shipping regulations.</p>	All employees working in Building 779 will be trained in accordance with the requirements found in the Building 779 Decommissioning Operations Program (DOP) and will comply with the training requirements found in the Rocky Flats Environmental Technology Site (RFETS) Decommissioning Program Plan (DPP).	

Table 1
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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.6.2 Internal Review & Change Program	<p>An internal review and change program for Building 779 8s accomplished by:</p> <ul style="list-style-type: none"> • Configuration Change Control Program • Engineering Review • Integrated Work Control Program • Inspection and audits <p>Configuration control applies to safety systems, standardized equipment, and to related engineering design documents, to prevent unauthorized or hazardous alterations to equipment or record documents. Integrated Work Control Program packages are reviewed by the facility management, the Health, Safety and Environment (HS&E) organization, and other support groups (e.g., Fire Department and Quality Assurance) to assure that changes meet applicable requirements.</p> <p>Under the building management direction, monthly safety inspections of operational areas and activities within Building 779 are conducted. The results of these inspections are reported to Building 779 management. Routine inspections and audits by HS&E, Fire Department and other support groups also ensure that the facility is maintained in a safe condition.</p>	<p>All engineering functions for Building 779 will be controlled according to the requirements found in the Building 779 Decommissioning Operations Program (DOP) and will comply with the Rocky Flats Environmental Technology Site (RFETS) Decommissioning Program Plan (DPP).</p> <p>Work control during the D&D of the building will be performed according to the site Integrated Work Control Program.</p> <p>Safety controls and inspections within Building 779 will be conducted according to the requirements found in the Building 779 Decommissioning Operations Program (DOP) and will comply with the Rocky Flats Environmental Technology Site (RFETS) Decommissioning Program Plan (DPP).</p>	
7.6.3 Procedures	<p>The facility management reviews and approves all Nuclear Material Safety Limits (NMSL), Operational Safety Analyses (OSA), and operational procedures before any operation which requires them is placed into service. The appropriate health and safety manual (or equivalent) also specifies safety procedures that apply to Building 779 operations.</p>	<p>Activities performed within Building 779 will be conducted according to the requirements found in the Building 779 Decommissioning Operations Program (DOP) and will comply with the Rocky Flats Environmental Technology Site (RFETS) Decommissioning Program Plan (DPP).</p> <p>Building 779 D&D management reviews and approves all Nuclear Material Safety Limits (NMSL), D&D procedures, and any operational procedures before any activity which requires them is placed into service.</p>	

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Nuclear Safety Control	Nuclear Safety Requirement	DOP Requirement	Downgrading Criteria
7.6.4 Facility Management	<p>The building 779 complex is managed by an Operations Management Organization. The Operations Manager is responsible for the safety of building personnel and for the administration of general building activities. The Operations Manager's responsibilities relevant to safety include maintenance, housekeeping, emergency response training, enforcement of operating procedures and general safety rules, and notification of any modifications, actual or proposed, in facilities or operations that will impact the safety of any operations or which fall outside the scope of the approved Final SAR.</p> <p>Building 779 is also supported by other groups, such as Utilities, Maintenance, HS&E, Quality Engineering & Control, Security, etc. These groups report through their organizations, but also have a matrix management responsibility to the building management.</p>	<p>The Building 779 D&D Project Manager is responsible for the safety of personnel and activities in the building. Building 779 is being managed in accordance with the administrative controls described in this Building 779 Decommissioning Operations Program (DOP) and will comply with the administrative controls found in the Rocky Flats Environmental Technology Site (RFETS) Decommissioning Program Plan (DPP). This is in agreement with the approved in the RFCA></p>	
7.6.5 Radiological Protection	<p>The Radiological Protection Program for Building 779 shall be maintained by the contractor to provide control of worker, public, and environmental exposures to radiological contamination and radiation sources AS Low As Reasonably Achievable (ALARA).</p> <p>For Building 779, the Radiological Protection Program shall include the following attributes:</p> <ul style="list-style-type: none"> • Establish processes for routine radiological surveillance, posting, and control of contamination and external exposure areas, personnel dosimetry, and radiation work permits. • Radiation Protection reviews of work plans and work control documents. • Established procedures for control of continuous air and effluent monitors and alarms to prevent unnecessary exposure of the public and the workforce from airborne radioactivity. • Establish procedures for control of Hoods, B-Boxes, and Downdraft tables face velocity requirements to prevent unnecessary exposure of the workforce from radioactive materials or toxic chemicals. 	<p>The Radiological Protection Program for Building 779 shall be maintained by the D&D Project Manager to provide control of worker, public, and environmental exposures to radiological contamination and radiation sources As Low As Reasonably Achievable (ALARA).</p> <p>For Building 779, the Radiological Protection Program shall include the following attributes:</p> <ul style="list-style-type: none"> • Routine radiological surveillance, posting, and control of contamination and external exposure areas, personnel dosimetry, and radiation work permits. • Radiation Protection reviews of work plans and work control documents. • Procedures for control of continuous air and effluent monitors and alarms to prevent unnecessary exposure of the public and the workforce from airborne radioactivity. 	